

FS-1 CLOSURE PLAN COMMENTS

S Lowe

Significant Comments

General

The sections of the closure plan need to be consistent with those in the guidance document *Closure Plan Template*, Ecology Publication 05-04-006. Sections in the template such as Section 3.2, "Removal of the Unit, Equipment, Piping, the Containment Structure, and Other Ancillary Equipment" which do not apply to FS-1 may then be addressed by simply saying none of these items are present or were ever used at this waste management unit. Doing so will ensure completeness of the closure plan and consistency with other closure plans, and remove all question as to whether these items were considered in the evaluation.

Section 1.1, page 1

Text says: "Included in the LLBG Trenches 31-34-94 OUG are the Trenches 31 and 34 Waste Storage & **Treatment** DWMUs and..." Treatment is not an approved waste management activity at Trenches 31 and 34. None of the Rev 8C addendums address treatment. "Treatment" cannot simply be inserted in the title of the unit without supporting documentation.

Section 2.0, page 2

The bulleted list of closure performance standards also needs to include (from the guidance):

- Remove all waste residues.
- Perform sampling to ensure MTCA Method B cleanup levels are met.

Section 3.3, page 4

This section needs to be titled "FS-1 Outdoor Storage Area Unit Inspection Prior to Decontamination." The scope of the inspection is more than records review and visual inspection. At minimum it should be consistent with what was performed for the 200-SW-2 characterization at LLBG 218-W-4C. There needs to be a rad survey of the entire area as rad is an indicator of mixed waste. There also needs to be organic vapor monitoring by IH using an OVM (for example). *Consideration* should be given to passive soil-vapor sampling for organics, similar to the (inexpensive) BESURE samplers by Beacon Environmental.

Section 3.6.2, Table 3-3, pages 8-9

Lacking a formal DQO, an explanation is needed of the criteria and the approach used to identify and select the target analytes.

Section 3.6.8, page 13

Several items regarding Quality Control:

- Clarify that field duplicate samples will be used to evaluate the overall precision of the complete sampling and analysis process.
- Add field split samples to the list of types of samples being collected and say these will be used to evaluate laboratory performance.
- Provide the basis for the frequency of collecting QC samples, such as 10% of the number of samples and a minimum of one sample of each type.
- Note that Ecology will be notified in advance to witness the field sample collection activities and may request sample splits for their own analysis.

Section 3.6.9, page 17

It's unclear how the DQA will be documented. Copies of the data validation report and DQA report need to be included in the Operating Record.

Section 3.7, page 18

See the sample text in the guidance. The role and involvement of the IQRPE in the field activities needs to be described.

Section 4.0, page 18

The tentative date when closure is planned needs to be provided and should be consistent with the site planning baseline. Alternatively, need to say that closure will commence when the permit mod becomes effective.

Section 5.0 (missing)

The guidance requires a Section 5.0 titled "Cost of Closure". However, a closure cost estimate and financial assurance is not required for federal facilities. This is addressed in the permit condition II.H. The closure plan needs to either provide a pointer to that permit condition or restate the information.

Minor Comments

General

(Editorial) Please refer to the unit by its proper name (with caps) as the FS-1 **Outdoor Container Storage Area** to avoid confusion.

Section 1.1, page 1

Text says: "...operated as units for disposal of treated and land disposal restriction (LDR) compliant dangerous and/or mixed waste." The wording is confusing. It may be better to say: "...operated as units for disposal of mixed low-level waste (MLLW). All MLLW disposed in Trenches 31 and 34 is compliant with land disposal restrictions (LDRs)."

Section 1.2, page 2

Dimensions should be provided in meters (m) and feet (ft) rather than yards (yd) for consistency with other documents.

Section 1.2, Table 1-1, page 2

GPS coordinates are provided in terms of Latitude and Longitude. Much of the work on site appears to be done in coordinates of Northing and Easting. For example, see the MSA civil survey reports or the 200-SW-2 LLBG characterization activities. If site staff will be doing the work described in the closure plan, coordinates in Northing and Easting should also be provided to avoid conversion which can introduce errors.

Section 3.3, Table 3-2, page 6

Delete the word "Mixed" from the title of the table as the table also includes containers of TSCA waste.